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Counsel for Defendant ROBERT DOYLE

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

ROBERT THOMAS DOYLE,

Defendant.

No. CR 14 - 0092 JST

STIPULATION AND ~~PROPOSED~~
ORDER CONTINUING CHANGE OF
PLEA DATE; EXCLUSION OF TIME

STIPULATION

IT IS HEREBY STIPULATED, by and between the parties to this action, that the change of plea date for defendant Robert Doyle, currently scheduled for December 12, 2014 at 9:30 a.m., may be continued to February 6, 2015, at 9:30 a.m. for change of plea. The parties are continuing to meet and confer however additional information has surfaced through witness interviews which may affect the resolution of this case. The government has provided discovery, however, defense counsel needs additional time to investigate the new information and the parties have not yet come to a resolution.

IT IS FURTHER STIPULATED THAT the time to February 6, 2015, should be excluded in accordance with the Speedy Trial Act, 18 U.S.C. §§ 3161(h)(1)(A) and (h)(7)(B)(iv) for effective preparation taking into consideration due diligence to enable defense counsel to investigate the

new information, review discovery and agree upon a resolution prior to the change of plea date.

DATED: 12/09/14

/s/
JOYCE LEAVITT
Assistant Federal Public Defender

DATED: 12/09/14

/s/
THOMAS MOORE
Assistant United States Attorney

I hereby attest that I have permission of the parties to enter a conformed signature (/s/) for all signatures within this e-filed document.

ORDER

GOOD CAUSE APPEARING, IT IS HEREBY ORDERED that the change of plea date for defendant Robert Doyle, may be continued to February 6, 2015, at 9:30 a.m. for change of plea.

IT IS FURTHER ORDERED THAT the time from December 12, 2014, to February 6, 2015, should be excluded in accordance with the provisions of the Speedy Trial Act, 18 U.S.C. §§ 3161(h)(1)(A) and (h)(7)(B)(iv) for effective preparation of counsel taking into consideration due diligence to enable the defense to investigate the new information and continue reviewing the discovery and allow the parties to resolve the case prior to the change of plea. The Court finds there is good cause and that the ends of justice served by the granting of the continuance outweigh the interests of the public and defendant in a speedy and public trial. Failure to grant the requested continuance would unreasonably deny counsel reasonable time necessary for effective preparation, taking into account due diligence.

SO ORDERED.

DATED: December 10, 2014

